

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
DONNA GAVIN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 18-10819-LTS
)	
CITY OF BOSTON and MARK HAYES,)	
)	
Defendants.)	
_____)	

SPECIAL VERDICT QUESTIONS FOR THE JURY

Question 1: Federal and State Law Claims for Discrimination

1. Did Ms. Gavin prove by the preponderance of the evidence that Defendant City of Boston discriminated against her in violation of federal and state law?

AS TO THE CITY OF BOSTON: YES: ✓ NO: _____

Please proceed to Question 2.

Question 2: Federal and State Law Claims for Hostile Work Environment

2. Did Ms. Gavin prove by the preponderance of the evidence that Defendant City of Boston perpetuated and maintained a hostile work environment in violation of federal and state law?

AS TO THE CITY OF BOSTON: YES: ✓ NO: _____

Please proceed to Question 3.

Question 3: State Law Claim for Interference With Right to be Free From Discrimination

3. Did Ms. Gavin prove by the preponderance of the evidence that Defendant Mr. Hayes interfered with her right to be free from discrimination in violation of state law?

AS TO MARK HAYES: YES: ✓ NO: _____

Please proceed to Question 4.

Question 4: Federal Law Claim for Retaliation

4. Did Ms. Gavin prove by the preponderance of the evidence that Defendant City of Boston retaliated against her in violation of federal law?

AS TO THE CITY OF BOSTON: YES: ✓ NO:

Please proceed to Question 5.

Question 5: State Law Claim for Retaliation

5A. Did Ms. Gavin prove by the preponderance of the evidence that Defendant City of Boston retaliated against her in violation of state law?

AS TO THE CITY OF BOSTON: YES: ✓ NO:

Please proceed to Question 5B.

5B. Did Ms. Gavin prove by the preponderance of the evidence that Defendant Mr. Hayes retaliated against her in violation of state law?

AS TO MARK HAYES: YES: ✓ NO:

If you answered "Yes" to one or more of Questions 1, 2, 3, 4, 5A, or 5B please proceed to Question 6.

If you answered "No" to Questions 1, 2, 3, 4, 5A, and 5B, skip Questions 6, 7, and 8, sign and date the form, and inform the court officer that you have reached a verdict.

Question 6: Emotional Distress and/or Reputation Damages

6A. Did Ms. Gavin prove by preponderance of the evidence emotional distress and/or reputation damages?

YES: ✓ NO:

If you answered "No" to Question 6A, skip Question 6B and proceed directly to Question 7A.

If you answered "Yes" to Question 6A, proceed to Question 6B.

6B. What amount of emotional distress and/or reputation damages do you award Ms. Gavin?

\$ 1,000,000 (amount expressed in numbers);

ONE MILLION DOLLARS (amount expressed in words)

Please proceed to Question 7A.

Question 7: Lost Overtime, Sick Time, and Vacation Damages

7A. Did Ms. Gavin prove by preponderance of the evidence lost overtime, sick time, and/or vacation damages?

YES: ✓ NO: _____

If you answered "No" to Question 7A, skip Question 7B and proceed directly to Question 8A.

If you answered "Yes" to Question 7A, answer the following Question 7B.

7B. What amount of lost overtime, sick time, and/or vacation damages do you award Ms. Gavin?

\$ 60,000 - (amount expressed in numbers);

SIXTY THOUSAND DOLLARS (amount expressed in words)

Please proceed to Question 8A.

Question 8: Lost Promotion Damages

8A. Did Ms. Gavin prove by preponderance of the evidence lost promotion damages?

YES: ✓ NO: _____


If you answered "No" to Question 8A, please sign and date the form and inform the court officer that you have reached a verdict.

If you answered "Yes" to Question 8A, answer the following Question 8B.

8B. What amount of lost promotion damages do you award Ms. Gavin?

\$ 940,000 - (amount expressed in numbers);
NINE HUNDRED FORTY THOUSAND DOLLARS. (amount expressed in words)

I hereby certify the foregoing answers are the unanimous answers of the jury.


Jury Foreperson

NOVEMBER 15, 2021
Dated: